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ORIGINAL

United States District Court for the Northern District of Texas
Dallas Division

NORTHERN DISTRICT OF TEXAS
FILED

APR 12 2002

CLERK, U.S. DISTRICT COURT
By _____
Deputy

(USA and)
Jamal Elhaj-Chehade
Co- plaintiff

Vs.

**Educational Commission for Foreign Medical Graduates
(entities and individuals) defendants**

3:01-CV-01301-L(BD)

Plaintiff's brief in support of his Emergency motion to appoint a counsel

April 12, 2002

The plaintiff request for an emergency motion and hearing o appoint a counsel is the following

Citations:

The defendants admitted to the US Government in their income Tax filings(1999) and in their directories(1997, and 2001 and 2002) to have a life term duty and obligations toward the plaintiff such duties(and obligations) include:

- 1- the defendants must assess the plaintiff's needs and accommodate his needs
- 2- that the defendants must engage in the benefits and promotion of excellence and advancement and prosperity of the plaintiff
- 3- that the defendants resources must be used in accordance with the terms and agreements and claims in their income tax filings and in their status as 501-3-C . which are to assess the plaintiff needs and accommodate those needs as to promote benefit, excellence, advancement and prosperity of the plaintiff and his needs.
- 4- The plaintiff will present to the court(in the court room) under the penalty of perjury, copies of the defendants Confessions in which they admit to the US Government(tax filings and directories) of their life-term duties and obligations toward the plaintiff.

Reasons and arguments

- 1- the first motion filed march 28th 2002 was forwarded to the Magistrate judge for action. But despite the emergency nature of the motion, the Magistrate judge did not take any action.
- 2- this motion is a part of a preliminary injunctive relief. The defendants must stop their violations immediately and start immediately implementing their duties and obligations toward the plaintiff as to prevent further damages. The court do have such duty to prevent further damages or the stop the current ongoing damages.
- 3- The defendants attorney admitted to the presence of Ex parte Communication between the court and the defendants in that any motion from the plaintiff is considered as dismissed even before its filing to the court. The plaintiff therefore is demanding that any ruling be done through hearings that are open and in the presence of the public.



- 4- The appointment of a counsel is the most urgent of the plaintiff's needs and it is a part of the injunctive relief sought and it is one of the duties and obligations of the defendants.
- 5- The defendants legal expenditures against the plaintiff violate their terms and obligations because they do not constitute a plaintiff's need, and if so, it will not lead to the plaintiff advancement or excellence or promotion etc... (the defendants legal expenditures for the 1999 is near 900 thousands dollars).
- 6- To award the plaintiff the appropriate reliefs Constitute a need. Therefore the use of influence as to deprive the plaintiff from any of all the reliefs violate the terms and the agreements and charter under which the defendants were created and this constitute a fraud and scam etc... for which the plaintiff is entitled the appropriate reliefs.

Wherefore premises considered, the plaintiff prays that upon proper hearing, in which all parties be present, and hearing be done open to the public and media. And the plaintiff present his admissible evidence. That this court render judgment in favor of the plaintiff by granting him his requests.

Certificate of service and Conference: this is to certify that this filing was done after the telephonic conference and notice of April 11, 2002 at 1303 Hour Dallas time between the plaintiff and the defendants attorney Mr Moscowics and with the defendants attorney via e-mail that a true copy of the foregoing was sent again to the defendants attorney Mrs. Susan Schwartz at 6688 N Central Expway # 850 Dallas Texas 75206-3913 on the day of Friday April 12, 2002 via USPS and e mail to the defendant attorney

Respectfully submitted to the Honorable Judge Sam Lindsey
Plaintiff Dr Jamal Elhaj-Chehade, pro-se(at this time) and IFP
5414 Cedar Springs# 806 Dallas, Texas 75235.
Plaintiff's e mail heyjam7@yahoo.com

